



**MFS Communications Company, Inc.**  
3000 K. Street N.W., Suite 300  
Washington, D.C. 20007  
TEL (202) 424-7709  
FAX (202) 424-7645  
**David N. Porter**  
Vice President, Government Affairs

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VIA COURIER

December 19, 1996

William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M Street  
Washington, D. C. 20554

RECEIVED  
DEC 19 1996  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Notice of Ex Parte Contact by MFS Communications Company,  
Inc., in CC Docket 96-98, CC Docket 96-45, CC Docket 96-149,  
FCC RM-8775, CCB-Pol 96-09

Dear Mr. Caton:

In accordance with § 1.1206 (a)(2) of the Commission's Rules, I am filing this letter as Notice that Ron Vidal, MFS Vice President - New Ventures, members of his staff and I met today with the FCC employees listed below to discuss and provide a live demonstration of the xDSL service announced by MFS on December 9, 1996. During the presentation, we discussed a variety of Internet technology and policy issues related to one or more of the above dockets. MFS' position on each of the issues discussed is fully disclosed in MFS' filings in these proceedings.

During the course of the demonstration, we provided the attached charts. No other material was distributed.

Sincerely,

Attachment

cc: Rodney Conway - OET  
Paul Gallant - CCB  
Vaikunth Gupta  
Elliot Maxwell - OPP  
Tom Mooring - OET

Lygeia Ricciardi - OPP  
Karen Rose - OPP  
Blaise Scinto - CCB  
Florence Setzer - CCB  
Bill Sharkey - CCB

Rob Tanner - CCB  
Steven Teplitz - CCB  
Kevin Werbach - OPP  
John Williams - OPP

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## **MFS Communications Co., Inc.**

### **NEW LOOP TECHNOLOGIES Enabling Medium To High Speed INTERNET ACCESS OVER UNBUNDLED COPPER LOOPS**

**Presentation to FCC Staff  
December 19, 1996**

## **MFS' New xDSL Services**

- **Service announced 12/9/96**
- **Intended for small to mid-size businesses**
- **First product: non-switched ISDN**
- **An immediate benefit of FCC implementation of the Telecommunications Act and the recent MFS/UUNET merger**
- **Roll out to begin in Silicon Valley in 1Q97**

## xDSL Service Benefits

- Offers Internet access at 128 Kbps - over four times current 28.8 Kbps modems
- Does not route through ILEC local switch avoiding both congestion and cost and improving throughput
- Uses unbundled copper loops with customer installed premises equipment and MFS equipment located in ILEC central offices

## Today's Demonstration ...

- Features both IDSL (128 Kbps) and HDSL (764 Kbps) each over single pairs of copper loops provided (on very short notice) by Bell Atlantic from its C.O. at 22nd and L
- T1 access to UUNET's VA Internet hub provided by MFS (on similarly short notice)
- Hardware, software and contents assembled and demonstrated by MFS

## Regulatory Implications

- Directly relevant to following ongoing or anticipated FCC proceedings
  - Interconnection
  - Universal Service
  - Access Charges
  - Separate Subsidiaries/Safeguards
  - RBOC InterLATA Entry
  - Various CEI plans, ACTA petition, etc.

## MFS Regulatory Positions

- All as expressed in relevant MFS filings
  - Unbundled loops at cost-based prices essential
  - Loops must support advanced services
  - Forward looking loop costs incorporate loop designs that enable advanced technologies
  - Internet services should not be declared to be regulated telecommunication services
  - RBOCs may provide Internet only via separate subsidiaries that satisfy Section 272

**Certificate of Service**

I hereby certify that on this 19th day of December, 1996, copies of the foregoing Notice of Ex Parte Presentation by MFS Communications Company, Inc. in 19th CC Docket 96-98, CC Docket 96-149, FCC RM-8775, CCB Pol. 96-09 and attachments, were served via Hand Delivery to the following:

William F. Caton (orig. + 9)  
Secretary  
1919 M Street, NW  
Room 222  
Washington, DC 20554

ITS, Inc.  
1919 M Street, NW  
Room 246  
Washington, DC 20554

Blaise Scinto  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

Bill Sharkey  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

Vaikmuth Gupta  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

Lygeia Ricciardi  
Office of Plans and Policy  
1919 M Street, N.W., Room 822  
Washington, DC 20554

Elliott Maxwell  
Office of Plans and Policy  
1919 M Street, N.W., Room 822  
Washington, DC 20554

Rob Tanner  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

Karen Rose  
Office of Plans and Policy  
1919 M Street, N.W., Room 822  
Washington, DC 20554

Kevin Werbach  
Office of Plans and Policy  
1919 M Street, N.W., Room 822  
Washington, DC 20554

Tom Mooring  
Office of Engineering and Technology  
2000 M Street, N.W., Room 489  
Washington, DC 20554

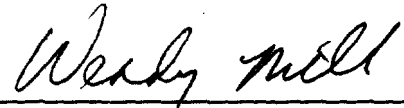
Rodney Conway  
Office of Engineering and Technology  
2000 M Street, N.W., Room 480  
Washington, DC 20554

Florence Setzer  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 554  
Washington, DC 20554

Steven Teplitz  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 554  
Washington, DC 20554

Paul Gallant  
Common Carrier Bureau  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

John Williams  
Policy and Program Planning Division  
1919 M Street, N.W., Room 544  
Washington, DC 20554

  
Wendy Mills